

## **REMARKS**

### **Pending Claims**

Claims 26-27, 29 and 31-33 have been amended. Claims 34-37 have been canceled without prejudice or disclaimer. Claims 1-25 were canceled by prior amendment. No new claims have been added. Accordingly, claims 26-33 are currently pending in this application.. A Request for Continued Examination (RCE) and the required fee accompany this paper so that the Examiner may fully consider the amendments to the claims and the following Remarks.

### **35 U.S.C. §§ 102 and 103**

Claim 34 stands rejected under 35 U.S.C. §102(e) as being anticipated by Davies et al., US Pat. No. 6,853,634 (hereafter "Davies"). Claims 26 and 27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Davies in view of Templin et al., US Pat. No. 5,781,550 (hereafter "Templin"). Claims 28 and 29 stand rejected under 35 USC §103(a) as being unpatentable over Davies et al., and Templin et al., further in view of Abdelaziz et al., Pat. No. 2003/0041141 (hereafter "Abdelaziz"). Applicants respectfully traverse these rejections, and request reconsideration and withdrawal of the rejections for the following reasons.

The present invention, as set forth in independent claims 26 and 31, is characterized by a computer environment in which the system provides a set of services to users. The services consist of a higher level service (e.g., a

management computer storing one or more first programs) and a lower level service (e.g., a plurality of devices storing a second program). Between these services, there is such a dependency or relationship that the higher level service utilizes the lower level service, and the highest level service is made open to the users, but the lower level services are not disclosed. The claims have been amended to attempt to make the relationships between the elements more apparent.

Davies discloses a system where a watching party transmits a contact request to a presence management system. The presence management system determines whether the requested watched part is available for contact by referring to the watched party information and a rule base. If the requested watched party is available, the management system connects both parties through a multiple access communications network (see Davies, e.g., col. 6, line 10 through col. 7, line 25).

In Davies, there is no relationship or dependency among the watched parties, but rather, all the watched parties are of equal level. If it is considered that the watched party is a service (col. 7, lines 57-58), there is no relationship in which a higher level service utilizes a lower level service due to the equivalence in service level of the watched parties. Thus, Davies fails to teach the relationships between the devices set forth in claims 26 and 31, such as a first computer sending a first request to a management computer, the management computer sending a second request to the plurality of devices, where the plurality of devices and the second

program are not disclosed to the first computer. Rather, in Davies, the requesting party must specifically identify the watched party in a contact request.

Page 4 of the Office Action states that Davies “fails to teach said second computer and said second program not being disclosed to said third computer”, and then cites Templin as teaching this aspect of the claims. Templin discloses a network system having a trusted host, a gateway and an untrusted host. The trusted host sends a packet to the untrusted host. The packet includes a source address of the trusted host and a destination address of the untrusted host. The gateway intercepts the packet, and provides security by changing the source address from the trusted host’s address to the gateway’s address and sends the modified packet to the untrusted host (see, col. 3, lines 16-25 of Templin).

Thus, in Templin, the trusted host needs to know the destination address of the untrusted host, unlike the first computer in Applicants’ amended claims, which is unaware of the undisclosed destination address of the plurality of devices. In particular, Templin teaches that each packet includes a source address, a destination address, and a payload (col. 3, lines 16-17). The destination address indicates where the packet should be sent (col. 3, lines 19-20). The gateway receives a packet having a destination address and diverts the packet to a proxy server if the destination address references an untrusted server (col. 3, lines 21-26). Accordingly, it is respectfully submitted that the assertion in the Office Action at page 4, last line, to page 5, first line, that “Templin et al. teaches a second computer and

said second program not being disclosed to said third computer..." is misinterpreting Templin's disclosure.

In Templin the address of the untrusted computer is clearly known to the trusted server, and Templin specifies that the address of the untrusted computer is used in the packet sent by the trusted server. In Templin, it is the address of the trusted server that is hidden from the untrusted server by the gateway for security purposes. Thus, there is no analogy between Templin and Applicants' invention because, in Templin, the source of the request is hidden from the untrusted server that receives the request. Under Applicants' invention, on the other hand, the source of the request, i.e., the first computer is not hidden, but rather the first computer does not know of the plurality of devices storing the second program that receive a second request from the management computer. Thus, in Templin, the untrusted server that is the provider of services is disclosed, and instead, the requestor of services, i.e., the trusted computer, is not disclosed to the provider of services. This is clearly different from Applicants' invention.

In view of the foregoing, it is apparent that the combination of Templin with Davies fails to teach Applicants' invention, including that "said plurality of devices receive said second request, execute said second program and send execution results as said results of said second request to said management computer without disclosure to the first computer of said plurality of devices or said second program", as set forth in Applicants' amended claim 26. Further, the combination of Davies

and Templin fails to teach or suggest that the processor "sends, to said first computer, a reply of said request including said results of instruction, said plurality of devices and said second program remaining undisclosed to said first computer", as set forth in Applicants' amended claim 31. Accordingly, independent claims 26 and 31 are allowable over the combination of Davies with Templin and the other art of record. The remaining claims are allowable at least because they depend from an allowable base claim.

### **Conclusion**

In view of the foregoing, Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,



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